



National Parks Conservation Association®
Protecting Our National Parks for Future Generations®

Cindy M. Berndt
Department of Environmental Quality
P.O. Box 1105
Richmond, VA 23218
Re: Dominion Virginia City Hybrid Energy Center

Thank you for the opportunity to comment on the State Air Pollution Control Board's request for additional information on the VEPCO / Dominion permits for a coal-burning power plant in Wise County. As you will recall, National Parks Conservation Association had requested, by letter dated February 21, 2008 (*Attachment 1*), that a hearing be held to fully explore alternatives to the proposed source as well as alternative technologies for the power plant that would achieve significantly lower emissions of dangerous pollutants. It is our belief that the earlier in the process the requirements of the Clean Air Act are fully examined and addressed, the better for the public, the environment, local communities, and for the interests of the applicant.

Although our February request was denied by Mr. Paylor, we want to take advantage of this opportunity to publicly raise the crucial question of what type of technology is to be used at this facility and provide background material on the available technology options for coal-fed power plants. [see *Attachment 2: Presentation by Clean Air Task Force on Coal Gasification*] As this information indicates there are more advanced, less polluting coal burning technologies available, that are in use today in other facilities,. Use of these technologies would greatly reduce the impact of this plant compared to the current proposal. Note that these suggested technologies could utilize Virginia coal.

We are grateful to the Department of Environmental Quality (DEQ) for creating a public web site where comments and documents can be reviewed by all interested parties. This site does an excellent job of providing links to the informative material from the Virginia Mercury Symposium <http://www.deq.virginia.gov/info/symposium.html>, sponsored by DEQ and held in Newport News in November, 2007. Several of the Symposium speakers informed attendees of both the latest science documenting the compelling need to reduce mercury emissions from coal burning power plants and the available technology to protect the public health and environment.

NPCA works for enforcement of the Clean Air Act in fulfillment of our mission to protect our National Parks for future generations. We urge interested parties to review our recent reports [Turning Point <http://www.npca.org/turningpoint/> & Unnatural Disaster <http://www.npca.org/globalwarming/>] to better understand the impacts of coal-burning power plants on America's National Parks – and the implications for the communities closer to these plants.

We will submit additional comments before May 16 and appreciate the chance to share these preliminary materials.

Sincerely,

Catharine M. Gilliam
Virginia Program Manager